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20 May 2019

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Communication
Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59; *Call Authentication Trust Anchor*, WC Docket No. 17-97; *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, GN Docket No. 18-238; *Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10

Dear Ms. Dortch:

On 16 May 2019, the undersigned and Gunnar Halley, both from Microsoft Corporation, met separately with Arielle Roth, Legal Advisor to Commissioner O’Rielly; Randy Clarke, Legal Advisor to Commissioner Starks; Zenji Nakazawa, Legal Advisor to Chairman Pai; and Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel to discuss matters pertaining to efforts to combat unlawful robocalls and caller ID fraud. With Mr. Clarke, we also discussed various sources of data for mapping the availability of broadband service.

On 17 May 2019, the undersigned and Mr. Halley met separately with Jamie Susskind, Chief of Staff to Commissioner Carr; and, along with Russ Penar of Microsoft (via teleconference), with Pamela Arluk, Connor Ferraro, Heather Hendrickson (via teleconference), Matthew Collins (via teleconference), and Justin Faulb (via teleconference) of the Wireline Competition Bureau and Eric Burger, Chief Technology Office of the Office of Economics and Analytics to discuss matters pertaining to efforts to combat unlawful robocalls and caller ID fraud.

We noted Microsoft’s work to address illegal robocalls, sympathized with the significant challenge illegitimate robocalls present, and expressed our hope that SHAKEN will have a meaningful impact on addressing these calls.

We raised concerns about the possibility that voice providers may implement SHAKEN in a non-uniform manner. This would occur, for example, if the same call is treated significantly differently depending on which provider's network is terminating the call. A non-uniform implementation of SHAKEN could significantly increase the difficulty for calling service providers to build originating calling services that comply with each provider's differing approach to SHAKEN and to ensure, ultimately, that their outbound calls receive the proper designation and termination. Non-uniform approaches also could lead to customer confusion if customers see the same incoming call treated differently on their work phone, home wireline phone, and mobile phone. We emphasized the importance of developing and maintaining consumer confidence in the reliability of the SHAKEN standard, since if a sufficient number of legitimate calls are treated differently and/or blocked, consumers could lose confidence in SHAKEN and stop relying on it. For these reasons, we also highlighted the danger that commingling other potentially less accurate analytics with SHAKEN in a non-transparent manner could have on consumer confidence. We expressed the hope that industry could reach agreement on a reasonably uniform approach to the implementation of SHAKEN that would resolve these concerns.

We also noted that it will be important to ensure that all technologies and communications business models have a path forward to obtaining the highest level attestation under the SHAKEN standard.

Finally, we cautioned that the Commission's draft proposal to permit call blocking on an opt-out basis would likely result in legitimate calls being blocked inadvertently, including calls that are important to the well-being of consumers. The reliability of the telephone network – which includes the confidence that a legitimate call will be transmitted to the desired recipient – has consistently been of paramount importance since the enactment of the Communications Act of 1934, and we expressed the view that it should remain of paramount importance even as the Commission and the communications industry engage in otherwise laudable efforts to combat illegal robocalls and caller ID fraud.

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Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced dockets. Please contact me if you require any additional information.

Respectfully submitted,

/s/ Paula Boyd

Paula Boyd
Senior Director, Government and Regulatory Affairs

cc (via e-mail):
Pamela Arluk
Eric Burger
Randy Clarke
Matthew Collins
Justin Faulb
Connor Ferraro
Heather Hendrickson
Travis Litman
Zenji Nakazawa
Arielle Roth
Jamie Susskind